

12. The allegations contained in Paragraph 12 are admitted.
13. These defendants lack sufficient knowledge to either deny or admit all of the allegations in paragraph 13 and require strict proof thereof.
14. The allegations contained in Paragraph 14 are denied.
15. The allegations contained in Paragraph 15 are denied.
16. These defendants lack sufficient knowledge to either deny or admit all of the allegations in paragraph 16 and require strict proof thereof.
17. The allegations contained in Paragraph 17 are denied.
18. These defendants lack sufficient knowledge to either deny or admit all of the allegations in paragraph 18 and require strict proof thereof.
19. These defendants lack sufficient knowledge to either deny or admit all of the allegations in paragraph 19 and require strict proof thereof.
20. These defendants lack sufficient knowledge to either deny or admit all of the allegations in paragraph 20 and require strict proof thereof.
21. These defendants lack sufficient knowledge to either deny or admit all of the allegations in paragraph 21 and require strict proof thereof.
22. These defendants lack sufficient knowledge to either deny or admit all of the allegations in paragraph 22 and require strict proof thereof.
23. The allegations contained in Paragraph 23 are denied.
24. These defendants lack sufficient knowledge to either deny or admit all of the allegations in paragraph 24 and require strict proof thereof.
25. The allegations contained in Paragraph 25 are admitted.
26. The allegations contained in Paragraph 26 are denied.
27. These defendants lack sufficient knowledge to either deny or admit all of the allegations in paragraph 27 and require strict proof thereof.
28. These defendants lack sufficient knowledge to either deny or admit all of the allegations in paragraph 28 and require strict proof thereof.
29. The allegations contained in Paragraph 29 are denied.
30. The allegations contained in Paragraph 30 are denied.
31. The allegations contained in Paragraph 31 are denied.
32. These defendants lack sufficient knowledge to either deny or admit all of the allegations in paragraph 32 and require strict proof thereof.

33. Responding to the allegations contained in Paragraph 33, these defendants admit that nothing out of the ordinary occurred in the shower room. The remaining allegations are denied.
34. The allegations contained in Paragraph 34 are denied.
35. These defendants lack sufficient knowledge to either deny or admit all of the allegations in paragraph 35 and require strict proof thereof.
36. These defendants lack sufficient knowledge to either deny or admit all of the allegations in paragraph 36 and require strict proof thereof.
37. The allegations contained in Paragraph 37 are denied.
38. These defendants lack sufficient knowledge to either deny or admit all of the allegations in paragraph 38 and require strict proof thereof.
39. These defendants lack sufficient knowledge to either deny or admit all of the allegations in paragraph 39 and require strict proof thereof.
40. The defendants lack sufficient knowledge to either deny or admit all of the allegations in paragraph 40 and require strict proof thereof.
41. These defendants lack sufficient knowledge to either deny or admit all of the allegations in paragraph 41 and require strict proof thereof.
42. These defendants lack sufficient knowledge to either deny or admit all of the allegations in paragraph 42 and require strict proof thereof.
43. These defendants lack sufficient knowledge to either deny or admit all of the allegations in paragraph 43 and require strict proof thereof.
44. The allegations contained in Paragraph 44 are denied
45. These defendants lack sufficient knowledge to either deny or admit all of the allegations in paragraph 45 and require strict proof thereof.
46. These defendants lack sufficient knowledge to either deny or admit all of the allegations in paragraph 46 and require strict proof thereof.
47. These defendants lack sufficient knowledge to either deny or admit all of the allegations in paragraph 47 and require strict proof thereof.
48. These defendants lack sufficient knowledge to either deny or admit all of the allegations in paragraph 48 and require strict proof thereof.
49. The allegations contained in Paragraph 49 are denied.
50. The allegations contained in Paragraph 50 are denied.
51. The allegations contained in Paragraph 51 are denied.

52. These defendants lack sufficient knowledge to either deny or admit all of the allegations in paragraph 52 and require strict proof thereof.
53. The allegations contained in Paragraph 53 are denied.
54. These defendants lack sufficient knowledge to either deny or admit all of the allegations in paragraph 54 and require strict proof thereof.
55. These defendants lack sufficient knowledge to either deny or admit all of the allegations in paragraph 55 and require strict proof thereof.
56. These defendants lack sufficient knowledge to either deny or admit all of the allegations in paragraph 56 and require strict proof thereof.
57. The allegations contained in Paragraph 57 are denied.
58. The allegations contained in Paragraph 58 are denied.
59. The allegations contained in Paragraph 59 are denied.
60. These defendants lack sufficient knowledge to either deny or admit all of the allegations in paragraph 60 and require strict proof thereof.
61. These defendants incorporate their prior responses to this Complaint as found in Paragraphs 1 through 60, and these Defendants expressly deny any factual allegation and or legal conclusions that have not been expressly admitted above.
62. The allegations contained in Paragraph 62 are admitted.
63. The allegations contained in Paragraph 63 are denied.
64. The allegations contained in Paragraph 64 are denied.
65. The allegations contained in Paragraph 65 are denied.
66. The allegations contained in Paragraph 66 are denied.
67. The allegations contained in Paragraph 67 are denied.
68. The allegations contained in Paragraph 68 are denied.
69. These defendants incorporate their prior responses to this Complaint as found in Paragraphs 1 through 68, and these Defendants expressly deny any factual allegation and or legal conclusions that have not been expressly admitted above.
70. The allegations contained in Paragraph 70 are denied.
71. The allegations contained in Paragraph 71 are denied.
72. The allegations contained in Paragraph 72 are denied.

73. These defendants incorporate their prior responses to this Complaint as found in Paragraphs 1 through 72, and these Defendants expressly deny any factual allegation and or legal conclusions that have not been expressly admitted above.

74. The allegations contained in Paragraph 74 are denied.

75. The allegations contained in Paragraph 75 are denied.

76. The allegations contained in Paragraph 76 are denied.

77. The allegations contained in Paragraph 77 are denied.

78. The allegations contained in Paragraph 78 are denied.

79. The allegations contained in Paragraph 79 are denied.

80. The allegations contained in Paragraph 80 are denied.

81. The allegations contained in Paragraph 81 are denied.

82. The allegations contained in Paragraph 82 are denied.

83. The allegations contained in Paragraph 83 are denied.

84. The allegations contained in Paragraph 84 are denied.

85. The allegations contained in Paragraph 85 are denied.

86. The allegations contained in Paragraph 86 are denied.

87. The allegations contained in Paragraph 87 are denied.

88. The allegations contained in Paragraph 88 are denied.

89. The allegations contained in Paragraph 89 are denied.

90. The allegations contained in Paragraph 90 are denied.

91. The allegations contained in Paragraph 91 are denied.

92. These defendants incorporate their prior responses to this Complaint as found in Paragraphs 1 through 91, and these Defendants expressly deny any factual allegation and or legal conclusions that have not been expressly admitted above.

93. The allegations contained in Paragraph 93 are denied.

94. The allegations contained in Paragraph 94 are denied.

95. The allegations contained in Paragraph 95 are denied.

96. The allegations contained in Paragraph 96 are denied.

97. The allegations contained in Paragraph 97 are denied.

98. These defendants incorporate their prior responses to this Complaint as found in Paragraphs 1 through 97, and these Defendants expressly deny any factual allegation and or legal conclusions that have not been expressly admitted above.
99. The allegations contained in Paragraph 99 are denied.
100. The allegations contained in Paragraph 100 are denied.
101. The allegations contained in Paragraph 101 are denied.
102. The allegations contained in Paragraph 102 are denied.
103. The allegations contained in Paragraph 103 are denied.
104. The allegations contained in Paragraph 104 are denied.
105. The allegations contained in Paragraph 105 require no answer.
106. All allegations not specifically admitted are denied.
107. These defendants deny being liable to the plaintiff in the amount sued for or in any amount.

AFFIRMATIVE DEFENSES

FIRST DEFENSE

108. The actions of these Defendant were done within the scope of their employment and they are entitled to qualified immunity.

SECOND DEFENSE

109. The decedent has not been deprived of any right, privilege, or immunity secured to him by the Constitution of the United States or any Act of Congress.

THIRD DEFENSE

110. The plaintiff has failed to state a claim against Defendants Plummer, Jackson and Montgomery as the allegations against them, although untrue, would be de minimis as pleaded.

FOURTH DEFENSE

111. The injury or death of the decedent was not the actual or proximate cause of any actions or inactions of any of these Defendants.

FIFTH DEFENSE

112. None of these Defendants breached any legal duties owed to the decedent.

SIXTH DEFENSE

113. These defendants reserve the right to assert additional defenses, affirmative or otherwise, upon further investigation and discovery into the matters alleged.

WHEREFORE, the Complaint should be dismissed and these defendants awarded their costs.

ANTHONY RAYMOND KELLY
GREGORY SCOTT PLUMMER
JOSHUA RAY JACKSON
WILLIAM ZACHARY MONTGOMERY

By Counsel

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By /s/ Cameron S. Bell
Cameron S. Bell
Counsel for Defendants Kelly, Plummer, Jackson and Montgomery

CERTIFICATE OF SERVICE

I certify that on March 14, 2023, I filed this pleading using the CM/ECF system, which provides a copy to counsel of record.

/s/ Cameron S. Bell
Cameron S. Bell